



**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

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Request for Comment

The Massachusetts Department of Telecommunications and Cable

("Department") is proposing to open a regional investigation of Verizon Massachusetts' ("Verizon") basic service quality in Berkshire, Hampden, Hampshire, and Franklin counties. Furthermore, the Department proposes to consolidate two existing town-specific Verizon service quality investigations -- D.T.C. 07-2 *Petition of the Board of Selectmen of the Town of Hancock Pursuant to G. L. c. 159, § 24 Regarding the Quality of Verizon Telephone Service*; and, D.T.C. 07-5 *Petition of the Town of Rowe Pursuant to G. L. c. 159, § 24 Regarding the Quality of Verizon Telephone Service*, and a pending undocketed complaint by the Town of Shutesbury into this proposed regional service quality examination. This notice is to explain the Department's proposal, and to seek comment on that proposal from interested parties, including the parties to the Hancock and Rowe cases and the signatories to the Shutesbury complaint.

The Department believes that a regional investigation is warranted at this time, given what appears to be significant concern about Verizon's service quality among telephone customers in many towns in Western Massachusetts. The Department recently completed an investigation of Verizon's service quality in the town of Middlefield, based on a formal complaint from the town. See D.T.E. 06-6 *Petition of the Board of Selectmen*

of the Town of Middlefield Pursuant to G. L. c. 159, § 24, Regarding the Quality of Verizon Telephone Service. In its decision in that case, the Department found that Verizon's service quality was unreasonable and required that Verizon comply with certain directives intended to address the areas of concern raised by the town and its residents.

In addition, as noted above, the Department is currently conducting separate investigations of Verizon's service quality in the Towns of Hancock and Rowe based on formal complaints from those towns. *See* D.T.E. 07-2. *See also* D.T.E. 07-5. Also, the Department has received a fourth formal complaint from a western Massachusetts town -- Shutesbury -- in a two-year period.¹ Further, the Department has received indications from other western Massachusetts communities of their intent to file formal quality of service petitions under G. L. Chapter 159, § 24. Finally, analysis of Verizon's monthly service quality index reports for the past year appear to indicate that trouble reports at the local level are higher in western Massachusetts than in other regions of the state.

The evidence, empirical and anecdotal, from the formal and informal complaints shows that the types of complaints from customers are similar throughout the region, and include such issues as repeated service outages, poor signal quality, delays in repairing or restoring service and generally in responding to troubles, and deficiencies in network maintenance and replacement of aged facilities. The types of complaints and their similarity throughout the region may suggest that Verizon is not allocating adequate resources to providing reasonable, reliable service to the cities and towns of western Massachusetts. A regional investigation will enable the Department to determine

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The Town of Shutesbury complaint has not yet been docketed.

whether there is in fact a widespread service quality problem in western Massachusetts and if so, how best to address the problem.

Accordingly, the Department seeks comments in general on the merits of this proposal, and specifically on the following questions: (1) Is there a reasonable basis for the Department to conclude that there may be a significant or widespread problem with Verizon's service quality in western Massachusetts, so as to justify opening an regional service quality investigation covering Berkshire, Hampden, Hampshire and Franklin counties; and (2) If there is sufficient evidence of a possible significant or widespread service quality problem in western Massachusetts, is a regional investigation the best approach for investigating the matter, and if not, what would be a better process for addressing the issues²; and (3) If the Department determines to open a regional Verizon service quality investigation, is it reasonable and appropriate for the Department to consolidate the existing town-specific investigations for the towns of Hancock and Rowe (D.T.C. 07-2 and D.T.C. 07-5) and the pending Shutesbury complaint into the new regional investigation

²

For example, a regional investigation, as opposed to the Department continuing to examine service quality in separate town-specific case, would facilitate historical data collection, since one key service quality measurement – trouble reports per 100 lines (RPHL) – is available at the Central Office level but not at the town level.

Parties wishing to comment on this matter may submit their comments in writing or electronically to:

Catrice C. Williams, Secretary
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Two South Station, 4th Floor
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617-305-3580
catrice.williams@state.ma.us

Comments must be received by 5:00 pm on February 23, 2009. Reply comments on this proposal may be submitted until 5:00 pm on March 9, 2009. For questions relating to this proposal please contact Lindsay E. DeRoche, Hearing Officer at lindsay.deroche@state.ma.us or at 617-305-3580. Be sure to reference "Proposed Regional Service Quality Investigation" in the subject line of all submissions to the Department on this matter. Please contact Catrice Williams at the above mentioned address to be included on the service list for this proposal.